Friends of Sligo Creek
PO Box 11572
Takoma Park, MD 20913

September 1, 2023

Montgomery County (Maryland) Planning Board
M-NCPPC
2425 Reedie Drive
Wheaton, MD 20902
mcp-chair@mncppc-mc.org

RE: Minor Master Plan Amendment

Dear Planning Board:

Herein constitutes written testimony from Friends of Sligo Creek (FOSC) regarding the Minor Master Plan Amendment (MMPA) for the Adventist properties in Takoma Park and neighboring Silver Spring. We are submitting this in advance of the public hearing on September 14, 2023 and the subsequent deadline for written comments. Please see our comments and reply to our questions below.

The Friends of Sligo Creek, established in 2002, is a non-profit community organization dedicated to protecting, enhancing, and enjoying the ecological health of Sligo Creek Park and its surrounding watershed. In addition to our hands-on work to reduce litter and non-native invasive plants and improve stormwater control and water quality, we also engage in advocacy for government policies and procedures that will benefit the watershed's ecology. The project outlined in the MMPA provides an opportunity to improve the watershed. It would be a mistake to regard it only as real estate development, but rather an environmental enhancement as well.

There is a vast reservoir of expertise regarding Sligo Creek as a natural and recreational resource and its Historical Interpretation. The Planning Department and other agencies involved in this

project should actively reach out to FOSC and Historic Takoma, Inc., for input as the project progresses.

STORMWATER AND WATER QUALITY

Sligo Creek Drainage

Construction Operations

Sligo Creek is routinely damaged by sediment pollution from nearby construction project, due to contactors ignoring sediment control regulations and the county facing enforcement challenges. The FOSC Water WatchDog program frequently reports on such pollution to the county's Department of Environmental Protection. A project of the scope envisioned for the Adventist properties must incorporate stringent oversight of sediment runoff into Sligo Creek by the city and the county.

3.d.i. Impervious Cover and 3.d.ii Water Quality and Stormwater Management

The site poses a severe storm water runoff challenge because of the steep slope at the western boundary and the dense clay soil type that resists water absorption. To prevent a further degradation of the immediate Sligo Creek area, the design should impose strict limits on impervious surfaces, require permeable surfaces wherever possible, and incorporate natural features to manage sediment runoff. Please provide a source and any calculations supporting the Impervious Surfaces figure (Appendix D, p.8). Including protected areas such as parks in this estimate tends to lessen the severity of the runoff problem here. Various estimates of impervious surface for the former WAH campus range from 54 percent to 80 percent. Uncontrolled and untreated runoff from these surfaces discharges to Sligo Creek down slopes of up to 25 percent. In the past, Sligo Creek has been subjected to several incidences of pollution attributed to these discharges. Monitoring at local sites (Maple Avenue and Jackson Ave outfalls) has revealed elevated levels of pollutants including suspended sediment and enteric bacteria.

Water management in Takoma Park is split between Stormwater (Takoma Park jurisdiction) and erosion and sediment control (MOCO jurisdiction). FOSC has found that existing erosion and sediment practices are not adequate for the protection of the creek, especially for major construction projects such as the Purple Line and Montgomery College. FOSC recommends that Appendix D be expanded to include specific goals, objectives, and conditions for adequate erosion control and enforcement of relevant regulations during construction at this location.

3.d.iii Brashear's Run and the Underground Drainage Network

FOSC acknowledges the significance of this tributary system; however, the information in this section is incomplete and erroneous. The map in this section was not prepared by a water management professional, is inconsistent with the historical record, and has not been validated.

The major implication of this analytical weakness is that, too often, the frequent spikes in water pollution in Sligo Creek from stormwater outfalls cannot be traced to their sources. This problem should be addressed before approval of the projects on both Maple Avenue and the Adventist property.

The headwaters of Brashear's Run are not well known since they are at least partially located outside of Takoma Park (District of Columbia, Silver Spring). A study performed for the city in 2012 revealed major uncertainties about Brashears sources including drains on Piney Branch Road, the WMATA Takoma Metro Station, Belle Ziegler Park/Montgomery College, and Blair Road. This study concluded that the stormwater mapping layers in the city were incorrect or deficient and require updating. As noted above, the Brashear's Run outfall is often highly contaminated by suspended sediment and enteric bacteria in addition to other water quality indicators. A significant amount of information regarding Brashear's Run and the Maple Avenue system is available and should be consulted. FOSC recommends that this section be rewritten to reflect known uncertainties and that delineation of Brashear's Run be included as an objective of the MMPA.

Washington Adventist Hospital was a significant user of chemical and radiological products in diagnostics, treatment, and maintenance. Over the years, chemical spills were reported both within hospital buildings and in the local environment. Medical facilities in general are known sources of chemical contamination to the environment that may be present in structural materials and soils. In addition, the age of the structures suggests that contaminants such as asbestos, mercury, lead, and polychlorinated biphenyls are likely to be present at the site. Besides the inherent environmental risks, they would pose health and safety hazards to workers and would need to be handled and disposed of according to regulations for hazardous materials. FOSC is concerned regarding the potential for escape of pollutants during demolition and construction and recommends that a formal Environmental Site Assessment be required as a condition of development of this site.

A portion of the WAH site between Maple Avenue and the Carroll Avenue bridge sits atop a steep escarpment that is immediately adjacent to the Sligo SVP, Sligo trail, and Sligo Creek. In places, the slope appears to be up to 25 percent, with drops of up to 40 feet between the crest and the streambed. Currently, the area atop the escarpment is terraced and built up by buildings set back from the edge and substantially smaller than those contemplated by the MMPA rezoning. The

soil conditions under the hardscape in general and along the escarpment in particular have not been characterized (no geotechnical investigation) and were likely disturbed by cut and fill operations during the construction of the original hospital buildings. The MMPA for this location ("Site 23") would allow buildings up to 120 ft in height. Depending on construction materials, this hypothetical building could weigh tens of thousands of tons. There is no evidence to suggest that the escarpment could support these masses. FOSC is concerned that the slope area leading down to the trail and creek is sufficiently unstable that it could result in displacement and slides from construction of large and heavy buildings without adequate stabilization and setback. FOSC recommends that a geotechnical and seismic stability assessment be conducted prior to a final decision of the rezoning of this area.

Long Branch Drainage

In addition to Brashear's Run, Long Branch is a significant tributary to Sligo Creek and ultimately the Chesapeake Bay watershed. Water quality and quantity from Long Branch should be included in any complete hydrologic analysis of this MMPA.

Generally speaking, there is a topographic divide running along the WAH/WAU campuses. To the southwest, the topography slopes toward Sligo Creek and to the northeast, it slopes toward Long Branch.

The area between the campus and Long Branch is poorly served by stormwater management features. There are storm drains along Greenwood between Maplewood and Division with additional inlets at Houston and Garland. This drain discharges directly to Long Branch. There is also substantial runoff from the eastern part of the MMPA area—there is a steep slope from about 230 ft. at Greenwood down to about 160 ft. at Long Branch indicating a high potential for runoff and overland discharge. In addition to the attention focused on Brashear's, the Planning Department should focus on mitigating these discharges to Long Branch.

NATURAL RESOURCES AND TREE CANOPY

Montgomery Parks property

FOSC endorses Montgomery Parks recommendation to formally "dedicate and identify" the wooded slope adjacent to the west edge of the Adventist property as M-NCPPC parkland. FOSC supports efforts by Montgomery Parks to protect and enhance this natural area in Sligo Creek Park. The wooded hillside between the WAH site and Sligo Creek is long neglected and highly degraded, plagued by rampant non-native invasive plants and isolated trees vulnerable to wind damage. In addition, the hospital installed large, black plastic pipes on top of the slope that drain

stormwater directly to the paved trail. In addition to their ineffective management of stormwater, these huge pipes created an ugly sight for park users. Better management of this wooded slope is desperately needed and Parks is the most appropriate entity to take that on.

We further recommend that the MMPA designate and require a vegetated buffer between the top of this fragile slope and all hardscape, such as buildings, roads, and parking areas. Such a buffer should be at least 100 feet wide and be planted with native trees and shrubs to protect the slope from the kind of damage it has suffered over the last few decades.

Tree Canopy

FOSC recommends that the MMPA stipulate maximum retention of the existing 90 native trees currently on the Adventist property west of Flower Ave. (See appendix below for a list.) Many of these trees are large, mature, impressive specimens (up to four feet in diameter) that have long been a treasured feature of the WAU and WAH campuses. The MMPA should document those that fall under the category of "Significant Tree" in the county's new Forest Conservation Law, defined as "a tree of any species that is 24 inches or greater in diameter at 4.5 feet above the ground," and any that are considered under the same law as a "Specimen Tree," defined as "a tree that is a particularly impressive or unusual example of a species due to its size, shape, age, or any other trait that epitomizes the character of the species."

Fully two-thirds (71) of trees on this property are oaks, which are uniquely advantageous to our wildlife. Oaks rank first among native trees in the eastern U. S. in the variety of caterpillar species they host (more than 500), making them indispensable to birds that depend upon them for nutrition, especially for feeding chicks in the nest.

In addition, nearly all of the 90 native trees on this property qualify as "urban forest trees" (minimum diameter of 7 and 5/8 inches) in Takoma Park's urban forest regulations. These rules require that any owner of private property in the city (including the Adventist site) must apply for and receive city approval before any such tree can be removed. The MMPA should confirm that no exceptions to these city rules be allowed under development of the site.

Please feel free to reach out to me with any questions about our written testimony on this project.

Yours,

Elaine Lamirande
President
Friends of Sligo Creek
president@fosc.org

Appendix: Native Trees on the Adventist Property West of Flower Avenue

White Pine (*Pinus strobus*) 16
White Oak (*Quercus alba*) 13
Southern Red Oak (*Quercus falcata*) 13
Northern Red Oak (*Quercus rubra*) 10
Red Maple (*Acer rubrum*) 7
Eastern White-cedar (*Thuja occidentalis*), 8
Willow Oak (*Quercus phellos*) 4
Eastern Hemlock (*Tsuga canadensis*) 4
Silver Maple (*Acer saccharinum*) 2
American Beech (*Fagus americana*) 2
Tulip-tree (*Liriodendron tulipfera*) 2
Black Gum (*Nyssa sylvatica*) 1
Eastern Red-cedar (*Juniperus virginiana*) 1
Oak spp TBD (Quercus spp) 4
Post Oak (*Quercus stellata*) 1
Ash sp TBD (*Fraxinus* sp.) 1
Southern Magnolia (*Magnolia grandiflora*) 1

Total = 90